

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

Cr. 0410083-NG

vs.

EDWIN RODRIGUEZ ET. AL.

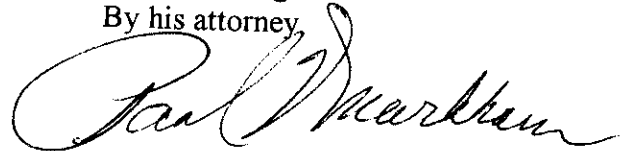
**MOTION FOR EXTENSION OF TIME TO RESPOND
TO PRESENTENCE REPORT AND SENTENCING**

Now comes the defendant, Edwin Rodriguez, in the above entitled case and moves that the time within which he must respond to the initial presentence report be extended to January 21, 2005 for the reason that his counsel did not receive the initial Presentence report until Tuesday, January 4, 2005, although the envelope in which it was contained was postmarked December 30, 2004. Defendant's counsel has been engaged in trial before Judge Saris from January 3, 2005 up to and including the date of this motion and, consequently, has been unable to review the report and make the necessary arrangements to obtain an interpreter and review the report with the defendant. Defendant's counsel will make every effort to secure an interpreter and review the report with the defendant as soon as practicable so as not to delay the sentence beyond February 1, 2005

Respectfully submitted

Edwin Rodriguez

By his attorney



Paul F. Markham

Certificate of Service

I, Paul F. Markham, certify that on January 10, 2005 I served a copy of the above document, in hand, to Assistant United States Attorney Peter K. Levitt and US Probation Officer Jo Lyness.



Paul F. Markham